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Attorneys for Plaintiffs	
BEST BUY CO., INC.; BEST BUY PURCHASI BUY ENTERPRISE SERVICES, INC.; BEST B L.P.; BESTBUY.COM, LLC	
UNITED STATES	DISTRICT COURT
NORTHERN DISTRI	CT OF CALIFORNIA
	SCO DIVISION
	)
IN RE: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION	Master File No. 3:07-cv-05944-SC MDL No. 1917
This Document Relates to:  Best Buy Co. Inc. et al. v. Hitachi, Ltd. et al., No. 3:11-cv-05513-SC  ViewSonic Corp. v. Chunghwa Picture Tubes, Ltd. et al., No. 3:14-cv-02510-SC	DECLARATION OF ALAN S. FRANKEL IN SUPPORT OF OPPOSITION TO CHUNGHWA PICTURE TUBES, LTD. AND CHUNGHWA PICTURE TUBES (MALAYSIA) SDN. BHD.'S MOTION IN LIMINE TO EXCLUDE OPINIONS REGARDING ACTUAL DAMAGES ATTRIBUTABLE TO THE CHUNGHWA DEFENDANTS  [DEFENDANTS' MIL NO. 21]  Date: TBD Time: TBD Place: Courtroom 1 Judge: Hon. Samuel Conti
Master Case No. 3:07-cv-05944-SC	DECLARATION OF ALAN S. FRANKEL ISO OPPOSITION TO CHUNGHWA MIL TO EXCLUDE EXPER

TESTIMONY REGARDING ACTUAL DAMAGES

## I, Alan S. Frankel, declare and state as follows:

- 1. I am President of Coherent Economics, LLC. I have been retained as an expert witness by Plaintiffs in the above-captioned actions currently pending in the United States District Court for the Northern District of California. The facts set forth herein are true of my own personal knowledge, except where based on a review of the pleadings and records in this action, and, if called as a witness, I could and would competently testify thereto.
- 2. In my capacity as an expert witness for sixteen Plaintiffs in these actions, I submitted a series of expert reports, including reports for Best Buy¹ and ViewSonic Corporation ("ViewSonic"). The reports were largely similar across the different Plaintiffs, but took into account some of the issues and data specific to each Plaintiff. My qualifications were described in detail in my initial expert reports.

## Best Buy

3. On April 15, 2014, I submitted the expert report for Best Buy (the "Best Buy Report"). In preparing the Best Buy Report, I was asked, among other things, to

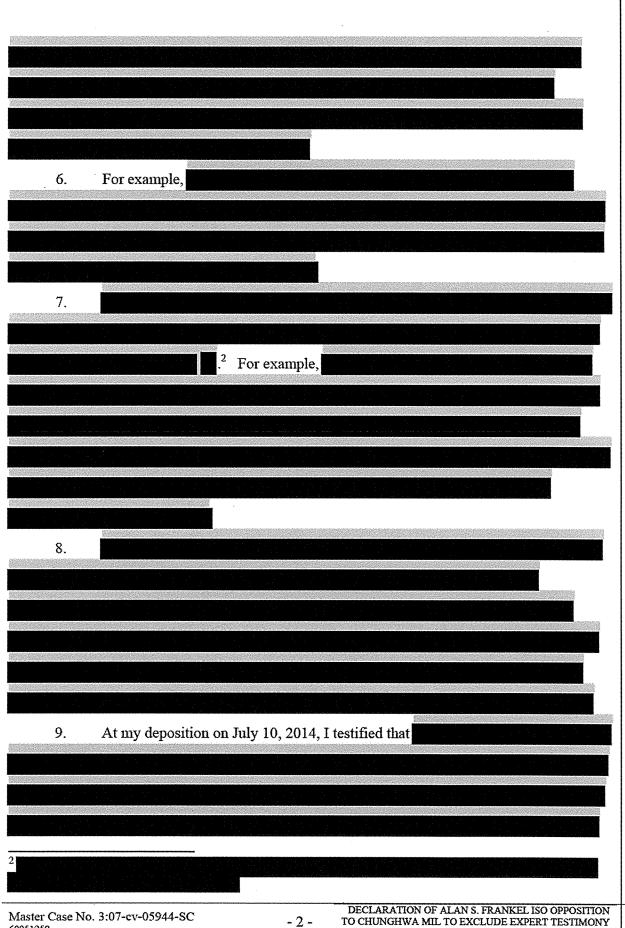
I was also asked to

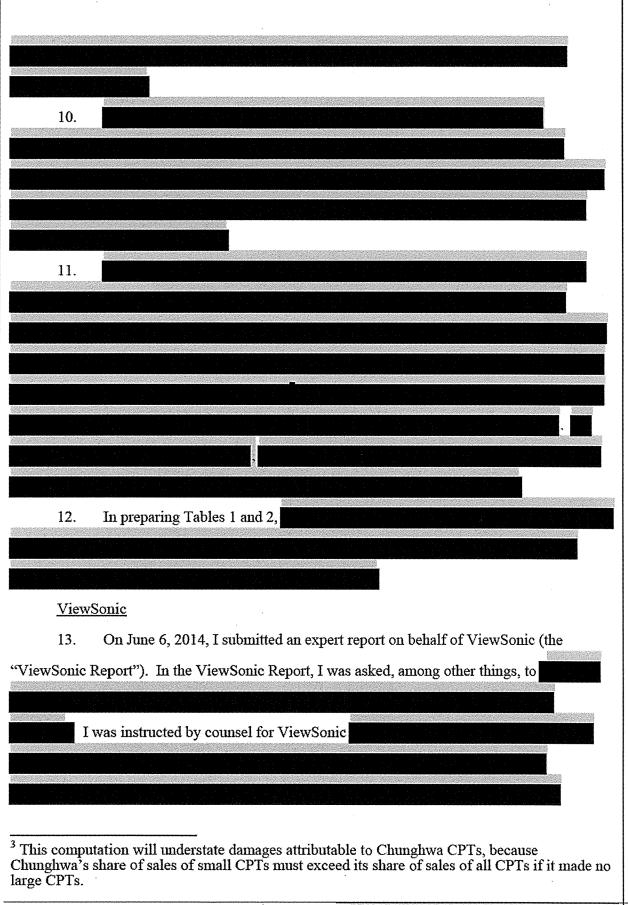
For the latter computation,

4. I have been asked by counsel for Best Buy to explain

5.

<sup>&</sup>lt;sup>1</sup> "Best Buy" consists of Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., and Bestbuy.com, L.L.C.





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3	WE TOOK CONSTRUCTION OF THE PROPERTY OF THE PR
4	14. The work that I performed in the ViewSonic Report
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11	15. Attached to my declaration as Exhibit C is Table 3,
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18	I declare under penalty of perjury under the laws of the United States of America and the
19	State of California that the foregoing is true and correct.
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21	Executed this 27th day of February 2015 in Highland Park, IL.
22	Executed this 27th day of February 2015 in Highland Park, IL.
23	Alan S. Frankel
24	And G. Hamer
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